



**EPSTEIN DRANGEL LLP**

60 East 42nd Street, Suite 1250, New York, NY 10165  
T: 212.292.5390 • E: mail@ipcounselors.com  
www.ipcounselors.com

February 23, 2024

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007-1312

**Re: *Just Play, LLC v. A.S. Plastic Toys Co., Ltd., et al.***  
**Case No. 19-cv-9399**  
**Status Letter**

Dear Judge Ramos:

We represent Plaintiff Just Play, LLC (“Plaintiff”) in the above-referenced action and respectfully submit the instant letter in accordance with the Court’s December 26, 2023 Order. (Dkt. 107).

As indicated in Plaintiff’s December 22, 2023 status letter (Dkt. 106), Plaintiff’s counsel has been communicating with an attorney, who, upon information and belief, previously worked with Mr. Orel and now represents the Orel Defendants. Plaintiff’s counsel is in close contact with new counsel for the Orel Defendants and expects to receive the executed settlement agreements for ten (10) of the Orel Defendants that Plaintiff reached settlement with from their new counsel in the coming weeks. Accordingly, Plaintiff respectfully requests additional time to finalize such settlements with the Orel Defendants and confirm that no further Orel Defendants wish to settle before Plaintiff moves for default judgment against them, and respectfully requests to (1) submit a status letter providing the Court with an update, or (2) move for default judgment by April 26, 2024.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**EPSTEIN DRANGEL LLP**

BY: /s/ Gabriela N. Nastasi

Gabriela N. Nastasi

gnastasi@ipcounselors.com

60 East 42nd Street, Suite 1250

New York, NY 10165

Telephone: (212) 292-5390

Facsimile: (212) 292-5391